

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: INSULIN PRICING LITIGATION

**Case 2:23-md-03080 (BRM) (RLS)
MDL No. 3080**

**JUDGE BRIAN R. MARTINOTTI
JUDGE RUKHSANAH L. SINGH**

THIS DOCUMENT RELATES TO: 25-cv-01845

**THE GOVERNMENT OF PUERTO RICO'S
MOTION FOR LEAVE TO AMEND COMPLAINT**

TO THE HONORABLE COURT:

NOW COMES Plaintiff, the Government of Puerto Rico (“Puerto Rico” or the “Government”), through its undersigned counsel, and respectfully moves the Court for leave to amend its Complaint pursuant to Rules 16(b)(4) and 15(a)(2) of the Federal Rules of Civil Procedure. In support of its motion, the Government submits the attached memorandum in support of its motion and the proposed Second Amended Complaint (“SAC,” attached as Exhibit 1).

WHEREFORE, the Government respectfully requests that this Court issue an Order granting this Motion and permitting the Government to file the SAC.

DATED: June 6, 2025

RESPECTFULLY SUBMITTED,

DEPARTMENT OF JUSTICE OF PUERTO RICO

/s/ Elizabeth Paige Boggs

LINDA SINGER

Admitted Pro Hac Vice

DAVID I. ACKERMAN

ELIZABETH PAIGE BOGGS

Admitted Pro Hac Vice

DEVIN X. WILLIAMS

Admitted Pro Hac Vice

MOTLEY RICE LLC

401 9th Street, NW, Suite 630

Washington, DC 20004

Tel. (202) 386-9626
Fax. (202) 386-9622
lsinger@motleyrice.com
dackerman@motleyrice.com
pboggs@motleyrice.com
dwilliams@motleyrice.com

ANDRÉS W. LÓPEZ
Admitted Pro Hac Vice
THE LAW OFFICES OF
ANDRÉS W. LÓPEZ, P.S.C.
P.O. Box 13909
San Juan, PR 00908
Tel. (787) 294-9508
andres@awllaw.com